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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of
Telephone Number Portability

CC Docket No. 95-116

NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS'
COMMENTS

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NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS COMMENTS

Pursuant to Sections 1.415 and 1.419 of the Federal Communications Commission's Rules of Practice and Procedure, 47 C.F.R. §§ 1.415 & 1.419 (1995), the National Association of Regulatory Utility Commissioners ("NARUC") respectfully files these comments in response to the FCC's March 14, 1996 Notice [DA 96-358] seeking further comments on telephone Numbering Portability ("NP") rulemaking in this proceeding.

DISCUSSION

The Notice "[s]eeks comment on how the passage of the Telecommunications Act...may affect the issues" raised in this proceeding. The Notice specifically requests parties not simply reiterate their previous comments, but confine discussion to how particular issues have been affected, if at all. NARUC's original comments suggest that (1) more data about the development and implementation of the different types of NP should be collected, (2) the FCC should encourage States to move forward with NP workshops, trials, and full NP implementations as one means of gathering timely information, and (3) the FCC should use the data gathered in this proceeding and from State implementation proceedings to establish nationwide policy guidelines concerning service provider, location and service telephone NP.

NARUC also asserted that the FCC guidelines should accommodate different State-implemented service provider solutions that are not inconsistent with nationwide NP policy.

Nothing in the Act changes NARUC's position.

CONCLUSION

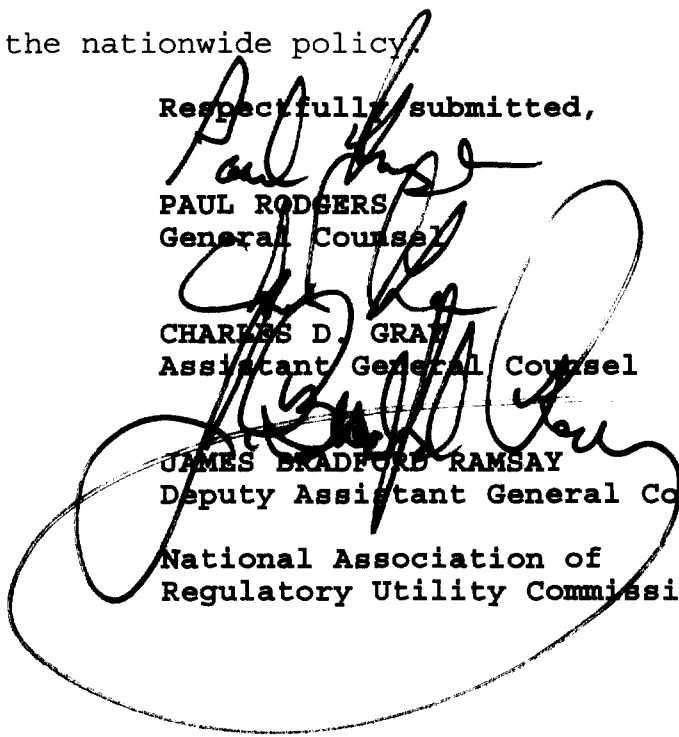
Based on the foregoing, NARUC continues to respectfully request that the FCC (1) continue to allow and encourage State Commissions to move forward with existing and future NP workshops, trials and full NP implementation schedules and (2) use the data - gathered from, inter alia, the various multiple state NP initiatives - to establish nationwide service provider, location and service telephone number portability policy guidelines which accommodate states-implemented service provider solutions that are not inconsistent with the nationwide policy.

Respectfully submitted,


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RM 8535

CERTIFICATE OF SERVICE

I, JAMES BRADFORD RAMSAY, certify that a copy of the foregoing
was served on all parties on the attached Service List.



James Bradford Ramsay
Deputy Assistant General Counsel

National Association of
Regulatory Utility Commissioners

March 29, 1996